

Contract No.: EP-C-09-020  
Work Assignment: **WA 2-10**

1. **Title:** **NPDES Vessel Regulatory Considerations**

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3. **Level of Effort:** 7155 hours

4. **Period of Performance:** Date of issuance through February 29, 2012

5. **General Work Assignment Requirements:**

A. Confidential Business Information: The Contractor will, at all times, adhere to Confidential Business Information (CBI) procedures, including those requirements listed at 40 CFR Part 2, when handling industry information that the EPA Work Assignment Manager (WAM) identifies as CBI. When noted as necessary by the EPA WAM, the Contractor will manage specified reports, documents, and other materials, as well as specified draft documents developed under this WA in accordance with the procedures set forth in its "Security Plan for Handling Confidential Business Information Under the Clean Water Act (CWA)," dated March 5, 2004 or its successor approved plans.

B. Identification as Contracting Staff: To avoid the perception that Contractor personnel are EPA employees, Contractor personnel shall be clearly identified as independent Contractors of EPA when participating in events with outside parties and visiting field sites. When speaking with the public the Contractor should refer all interpretations of policy to the EPA WAM.

- C. Limitation of Contractor Activities: The Contractor shall submit drafts of all deliverables to the EPA WAM and alternate EPA WAM for review. The Contractor shall incorporate all EPA WAM comments into the final deliverables, unless otherwise agreed upon by the EPA WAM. The Contractor shall adhere to all applicable EPA management control procedures as implemented by the EPA Contracting Officer (CO), Project Officer (PO), and WAM.
- D. Compliance with Section 508 Requirements: Section 508 of the Rehabilitation Act mandates that all Federal departments and agencies make electronic and information technology accessible to individuals with disabilities. This includes all individuals with disabilities wishing to access Federal information. EPA is committed to making every possible effort to ensure that all electronic and information technology developed, procured, maintained, or used by EPA is accessible to all persons with disabilities. Consequently, according to the contract clause "EPAAR 1552.2119-79: Compliance with EPA Policies for Information Resources Management," all deliverables submitted by the Contractor shall be compliant with the Section 508 requirements.
- E. Travel: When travel outside of the local area becomes necessary in support of this WA, a travel authorization must be submitted to and approved by the EPA WAM and the EPA Project Officer prior to the travel taking place. All travel shall be in accordance with FAR 31.205-46.
- F. Draft and Deliverable format: All memos, draft comments, summaries and responses are to be provided electronically in Microsoft Word and/or Excel. The Contractor shall clearly specify the methods, procedures, considerations, assumptions, relevant citations, data sources and data that support their conclusions. EPA will review all outputs in draft form, and the Contractor shall incorporate the changes specified by EPA prior to providing a final version. All final materials, e.g., memos, tables, spreadsheets, etc. are to be prepared only after incorporating comments on draft documents provided by the EPA WAM.

**Task 1: Project Management**

The Contractor shall prepare a work plan within 21 calendar days of receipt of WA. The work plan shall present the technical approach by task; the project schedule and deliverables; staffing details; level of effort by task, staff member, and professional labor mix; and the estimated budget.

The Contractor shall provide electronic copies of the monthly progress reports to the EPA Project Officer (PO) and WAM. Each progress report shall describe the technical work and expenditures for the same time period as the corresponding invoice. The reports shall list by task the amount of work completed and include a table of hours by personnel for each task. The reports also shall identify any problems or difficulties. Quarterly, the

reports shall include a QA section that summarizes QA steps taken in the performance of work during the reporting period.

The Contractor shall submit an email that proposes a standardized naming convention and version control for all deliverables associated with the WA. This system will ensure that deliverables are clearly named and dated and that the sequence of versions of a document is clear. The EPA WAM will review the email and then provide the contractor with written notification of approval or edits that need to be made. After receiving notification of approval the contractor shall use this standardized convention for all deliverables associated with the work assignment(s).

The Contractor shall immediately notify the EPA WAM by telephone of any problems that may impede performance, along with any corrective actions needed to solve the problems.

**Task 1 - Deliverables:**

1 - 1.0 - Work plan and budget: Within 21 days of receipt of work assignment

1 - 2.0 - Progress/budget reports: Included in the Monthly Technical and Cost Progress Report

1. - 3.0 - Problem report: Contractor shall notify the EPA WAM immediately upon discovery of a problem.

**Task 2: Provide Technical Support to development of EPA's Vessel General Permitting Program**

Due to a 2006 court order, EPA began permitting incidental vessel discharges from many vessels on February 6, 2009. The 2008 Vessel General Permit (VGP) regulates discharges incidental to the normal operation of vessels operating in a capacity as a means of transportation. The VGP includes general effluent limits applicable to all discharges; general effluent limits applicable to 26 specific discharge streams; narrative water-quality based effluent limits; inspection, monitoring, recordkeeping, and reporting requirements; and additional requirements applicable to certain vessel types. As EPA develops its next generation of permits, the Agency needs support developing appropriate permit terms and conditions.

The Contractor shall support EPA's development of technical and factual materials for EPA use in implementing its Vessel General Permitting Program. This support will primarily be focused around developing background information and effluent limits for the Vessel general permit, but may also include conducting research for other vessel related discharge issues.

**Subtask 2A:** The Contractor shall support the development of potential permit limits for the 26 or more different categories of vessel discharges (e.g. oily water separators, graywater systems, ballast water systems, fish hold effluent discharges). The contractor shall conduct literature reviews, develop background materials, research technologies,

and work with industry experts and government officials to develop a solid foundation for instituting national permit limits. After reviewing these sources of information, the contractor shall prepare several 10 – 50 page technical memoranda (plus appendices with relevant data) describing the sources of information, key findings from those sources, technological capabilities and efficacy, cost information where relevant, and what conclusions, if any, can be drawn from this information. Once final, these memoranda shall be of sufficient quality to place in the docket and serve as part of the administrative record for decision making. Subject areas to be researched include, but will not be limited to:

1. Oily water separator treatment technologies;
2. Graywater treatment technologies (including graywater treatment technologies that treat both graywater and sewage);
3. Fish Hold Effluent Management Practices;
4. Exhaust Gas Scrubber washwater mitigation measures;
5. Availability of “environmentally friendly” cleaners and degreasers (e.g., toxics, phosphate free, biodegradable);
6. Availability and efficacy of various anti-foulant hull coatings;
7. Aqueous Film Forming Foam (AFFF) alternatives (including efficacy of those alternatives in fighting fires) and when AFFF is required; and
8. Other discharge types as appropriate.

Within 14 days of receiving written technical direction from the EPA WAM to proceed, the contractor shall submit an annotated outline of the technical memorandum and appendices identifying the information, conceptual approaches, and analyses, and scope of issues to be addressed in the technical memorandum. After approval by the EPA WAM, the Contractor shall prepare and submit a draft version of the technical memorandum within 28 days. The Contractor shall submit the final memoranda within 14 days of receiving technical comments from the EPA WAM.

**Subtask 2A - Deliverables:**

2A - 1.0 - Draft discharge types and systems memoranda: The Contractor shall provide draft technical memoranda describing different discharge types and systems. The number of technical memoranda will be between 6 to 15 documents. The kinds of information and format of the draft memoranda and the number of draft memoranda will be determined by the WAM after discussion between the WAM and contractor.

2A - 2.0 - Final discharge types and systems memoranda: The Contractor shall provide final technical memoranda describing different discharge types and systems. The number of technical memoranda will be between 6 to 15 documents. The number of final technical memoranda will be determined by the EPA WAM after discussion between the EPA WAM and contractor.

**Subtask 2B: Permit and Factsheet Language Development Support**

The Contractor shall support EPA in developing permit and factsheet language by preparing memoranda on specified topic areas for which EPA needs a better understanding of the regulated universe or other domestic and/or international regulation.

For instance, the contractor may be asked to prepare a memorandum on certain vessel types or classes and how they may be similar or differ to other classes.

Within 14 days of receiving technical direction from the EPA WAM to proceed in a specific area, the contractor shall submit a draft version of the draft memorandum. The contractor shall submit the final memoranda within 14 days of receiving technical comments from the EPA WAM.

**Subtask 2B - Deliverables:**

2B - 1.0 - Draft VGP development memoranda: The Contractor shall provide draft technical memoranda describing VGP development. The number of technical memoranda will be between 0 to 15 documents. The kinds of information and format of the draft memoranda and the number of draft memoranda will be determined by the EPA WAM after discussion between the EPA WAM and contractor

2B - 2.0 - Final VGP development memoranda: The Contractor shall provide final technical memoranda describing VGP development. The number of technical memoranda will be between 0 to 15 documents. The number of final technical memoranda will be determined by the EPA WAM after discussion between the EPA WAM and contractor.

**Subtask 2C: Ballast Water Data Evaluation**

The Contractor shall support EPA in responding to ballast water data reports produced by the National Academy of Sciences and EPA's Science Advisory Board. The work for this subtask will start in this period of performance, with the vast majority continuing to the next period of performance.

Upon receiving technical direction from the EPA WAM, the Contractor shall prepare a plan for supporting EPA in its risk management decisions. Based upon the reports, the contractor may be required to conduct modeling activities using either Population Viability Analysis models, Diffusion models, or other approaches. Any results from these models will be used to inform EPA's decision making for establishing Ballast Water Limits.

Additionally, the Contractor may be requested to gather supplementary data to fill in gaps in EPA's Science Advisory report on data availability. This supplemental data will generally focus on costs of systems and manufacturing capabilities from companies. If supplementary data is requested a record or email from the Contractor to the EPA WAM stating the volume and kinds of data gathered which has been agreed upon shall be sent to the EPA WAM.

**Subtask 2C - Deliverables:**

2C - 1.0 - Technical Memorandum: One technical memorandum discussing modeling results and any supporting model output. A fully developed model and framework to run future iterations of that model (e.g., developed code). Up to 3 technical memoranda discussing elements of ballast water treatment availability.

**Subtask 2D: Review Coast Guard Response to Comments**

The Contractor may provide support by reviewing portions of the US Coast Guard comments on ballast water rulemaking. The contractor shall review these comments looking for specific subject areas. Using resources provided by EPA, possibly including contract indices, the contractor shall work with USCG staff and the documents to search for specific subject areas which may overlap with the VGP, specifically in regards to Coast Guard comments on technological availability of systems and references to the Vessel General Permit.

**Subtask 2D - Deliverables:**

**2D - 1.0 - Technical Memorandum:** The Contractor shall develop up to 3 memoranda summarizing and referencing key comments in the Coast Guard's response document.

**Task 3: Provide technical support to EPA in development of the Small Boat and Commercial Fishing Vessel General Permit (sVGP)**

On July 31, 2008, Senate bill S. 3298 (PDF) (3 pp, 63K) was signed into law (P.L. No. 110-299). This law generally imposes a two-year moratorium during which time neither EPA nor states can require NPDES permits for discharges incidental to the normal operation of commercial fishing vessels and other non-recreational vessels less than 79 feet. Among other things, the moratorium does not apply to ballast water. P.L. 110-299 also directed EPA to conduct a study of vessel discharges and issue a report to Congress. This report was finalized in August 2010. The moratorium for these vessels was extended until December 2013.

The CWA authorizes civil and criminal penalties for violations of the prohibition against the discharge of a pollutant without a permit, and also allows for citizen suits against violators. These types of discharges pose unique challenges, because vessels are highly mobile and the vessel universe is extremely diverse. In order to address the ramifications of the Court's ruling, EPA is exploring the available options, including finalizing the sVGP. EPA will likely do so as a completely separate permit under the same timeline as the next reissuance of the VGP.

**Any elements of this task and subtask may be turned on only by written technical direction of the EPA WAM.**

**Subtask 3A: Review Comments in the EPA's Response to Comment Document for the VGP**

The Contractor shall provide reviewing services of the Response to Comment document. All comments need to be reviewed for whether they a) discuss commercial fishing vessels, b) discuss vessels less than 79 feet, or c) discuss burden or recordkeeping for small or unmanned vessels.

The Contractor shall extract selected comments from the responses. Selected comments should be extracted from the response to comment document (with existing EPA comments) and placed into a word document. The new document should keep the same format and organization as the existing VGP response to comment document. If this

document is more than 100 pages, the Contractor shall separate into smaller modules to ease distribution.

**Subtask 3A - Deliverables:**

3A - 1.0 - Response documents: Within 14 days of being given written technical direction by the EPA WAM, the Contractor shall provide a finished extract of the key responses for the Response to comment documents.

**Subtask 3B: Provide Technical Support in Compiling, Analyzing and Developing a new Response to Comment Document**

After review of comments by EPA, the Contractor shall support EPA in preparing responses to these comments as requested by the EPA WAM. Contractor shall coordinate drafting of responses with existing EPA VGP and based upon technical direction from EPA. These comments will be used to justify appropriate logical outgrowth in finalization of the sVGP.

**Subtask 3B - Deliverables:**

3B - 1.0 - Comment Response document: Within 14 days of being assigned specific comments, the Contractor shall draft responses to those comments. If the draft responses should exceed 50 pages in length, the responses will be due within 21 days of being assigned. If they should exceed 100 pages, the responses shall be due within 28 days of being assigned.

3B - 2.0 - Final Response document: Within 7 days of receiving comments from the EPA WAM, the Contractor shall provide the final response document.

**Subtask 3C: Permit and Factsheet Language Development**

The Contractor shall support EPA in developing permit and factsheet language by preparing technical memoranda on specified topic areas or developing specific permit and factsheet language. For instance, the contractor may be asked to prepare a memorandum on fishing vessel BMPs which can be supported by the response to Comment document.

**Subtask 3C - Deliverables:**

3C - 1.0 - Technical Memorandum: The Contractor shall provide up to 10 technical memoranda, produced on subjects related to the sVGP development.

**Task 4: Provide Technical Support in the Completion of a Biological Evaluation (BE) under the Requirements of the Endangered Species Act (ESA) for the sVGP and/or the next issuance of the VGP**

In consultation with the Services (NOAA and Fish and Wildlife Service (FWS)), EPA will need to determine whether we should pursue informal or formal consultation on the sVGP. If formal consultation is required, the contractor will be requested to support EPA in adapting their May 2008 Biological Evaluation (BE) for use with this consultation.

EPA will likely need to conduct formal consultation on the next issuance of the VGP. In consultation with the Services, EPA will develop a modified version of its May 2008

draft Biological Evaluation for the next issuance of the VGP. The contractor shall begin laying the foundation for a biological evaluation.

**Subtask 4A: Support the Development of a Modified Biological Evaluation (BE)**

Using the 2008 BE as a basis, the Contractor shall support the development of a modified BE for the VGP and/or sVGP under Section 402.14(c) of the ESA regulations. The 2008 BE already discusses:

1. A description of the specific area that may be affected by the action.
2. A description of any listed species or critical habitat that may be affected by the action.

The Contractor shall support in updating:

1. A description of the action to be considered.
2. A description of the manner in which the action may affect any listed species/critical habitat and analysis of any cumulative effects.
3. Relevant reports, including any environmental impact statement, environmental assessment, or biological assessment prepared.
4. Any other relevant available information on the action, the affected listed species/critical habitat

The Contractor shall support in preparation of a draft letter requesting formal consultation and shall support in modification of the BE. The Contractor shall collect the additional information if needed to complete the BE in accordance with section 404.14(c) requirements.

**Subtask 4A - Deliverables:**

4A - 1.0 - Consultation Letter: The Contractor shall provide a draft letter requesting formal consultation from NOAA and Fish and Wildlife Service (highlighting the 6 criteria under ESA) 30 days after receipt of the Draft sVGP.

4A - 2.0 - Consultation Letter Re-Draft: The Contractor shall provide a revised draft due 21 days after receiving comments from the EPA WAM.

4A - 3.0 - Draft Biological Evaluation: The Contractor shall provide a modified draft BE consisting of a thorough outline and developed bibliography to the EPA WAM for EPA review and Services input 15 days after the contractor receives the draft sVGP. A revised document must be resubmitted within 14 days of receiving comments. The draft BE document shall be submitted 30 days after the contractor receives written approval of the draft BE outline and bibliography from the EPA WAM.

4A - 4.0 - Final Biological Evaluation: The Contractor shall provide the final BE document within 15 days of receiving written approval from the EPA WAM on the draft biological evaluation document.



#### **Subtask 4 B: BE Information Collection and Issues Development**

Using the 2008 BE as a basis, the Contractor shall support the development of a modified BE for the VGP under Section 402.14(c) of the ESA regulations (See discussion under Subtask A). In development of the BE, the contractor shall support in the collection of additional information if needed to complete the BE in accordance with section 404.14(c) requirements, and in consultation with the Services. EPA plans to meet with the Services in late 2011 and discuss the revised approach for consultation. The Contractor shall support EPA in its efforts to obtain the Services agreement on consultation and shall provide support conducting key research as needed.

##### **Subtask 4B - Deliverables:**

**4B - 1.0 - Outline for Biological Evaluation:** Within 30 days of the first meeting with the Services, the contractor shall prepare an updated outline for how to prepare the next BE.

**4B - 2.0 - Technical Memorandum:** Between 1-5 technical memorandum on specific issues related to the consultation which will support EPA and the Services in reaching consensus on how best to conduct the BE.

#### **Task 5: Coordination with States for their 401 Certification procedures and conditions and their Coastal Zone Management Reviews**

As part of the issuance of an NPDES permit, EPA must obtain 401 certification from states or states must waive 401 certification for a permit to be valid in those states waters. Additionally, EPA must work with the States on their Coastal Zone Management Review. To reduce the potential for conflicting conditions between States, and provide stakeholders with a greater chance for meaningful participation in a State's 401 certification process, EPA plans to make the following improvements to the "process" of State 401 certification of the next VGP and may implement such practices for the sVGP:

To provide sufficient time for public participation and for the States to coordinate their certifications (as appropriate), EPA could, consistent with 40 CFR § 124.53(c) (3) ("unusual circumstances" provision), provide States with an initial 6-month (instead of 60-day) timeframe to provide their 401 certifications, denials or waivers to EPA.

For the VGP, EPA requests for 401 certifications would be made contemporaneously with or soon after publication of the draft permit. For the sVGP, the timing of the requests for 401 certifications depends upon how EPA proceeds with finalizing this permit.

**Subtask 5A:** On a Region-by-Region or national basis, following issuance of the next sVGP or VGP, EPA will facilitate coordination among the States and Tribes by conference call or other arrangement as to the development of their 401 certification conditions. This would serve as an opportunity for EPA to explain to States the basis and support for the federal permit conditions and to allow States to share their concerns and potential approaches for addressing such concerns.

The Contractor shall support EPA by maintaining a contact list, status of VGP 401 certification, taking notes on calls or at meetings, and providing other support as needed.

**Subtask 5A - Deliverables:**

5A - 1.0 – Develop and maintain 401 Certification status list

The Contractor shall compile and update a list of contacts and status of VGP 401 Certification status.

5A - 2.0 – Facilitate conference calls

The Contractor shall support in the arrangement of up to 3 conference calls with the States and Tribes to assist them in the development of 401 Certifications.

**Subtask 5B: Organize National EPA/State Meeting on the Next VGP and 401 Certification**

As part of this process, EPA may organize a national meeting. This meeting may be a face-to-face meeting or a large webinar. Similarly to Subtask 5A, it would allow EPA to explain to States in greater detail the basis and support for the federal permit conditions and to allow States to share their concerns and potential approaches for addressing such concerns.

If the meeting is face to face, it would likely be held in government conference space in a Major American city for approximately 25-50 participants. The contractor would be responsible for providing logistical support, which could include arranging the Agenda, planning local meeting logistics, taking notes, and providing other support as needed.

**Subtask 5B - Deliverables:**

5B - 1.0 – Secure Meeting Facility: If it is determined that a public meeting is necessary, the contractor shall secure a facility and provide logistical support for approximately 20-25 participants. Logistical information (i.e. hotel and equipment costing information, etc) shall be provided to EPA within 2 weeks after meeting sites have been selected.

5B - 2.0 - Meeting logistical support: The Contractor shall provide onsite logistical support for the public meeting to include; Agenda, note taking, and other support as necessary. Draft agenda and registration materials shall be delivered 2 weeks before the meeting. Meeting summaries shall be delivered within 2 weeks after the meeting.

**Subtask 5C:** To facilitate public and stakeholder access to, and participation in, the development of State and Tribe 401 certification provisions, EPA will make available a publicly accessible webpage or other mechanism the States can use to upload and share information on their proposed 401 certifications, including any conditions, and their public comment/hearings process, with information to be updated as final conditions are received from the States and Tribes. EPA will also post final state certifications on the EPA website within a specified time period after their receipt.

The Contractor shall support EPA in tracking the status of states in their 401 certification process. The contractor shall develop a schedule or table to be used on this webpage or other tool to assist the public. The contractor shall also track draft and final 401

certification documents, and support EPA in both managing them for the Agency's use and organizing them for public use.

**Subtask 5C - Deliverables:**

5C - 1.0 - Develop Webpage or other tracking tool for 401 Certifications: The Contractor shall develop a webpage or other tool for tracking of the 401 Certifications status and hearing schedules. The Contractor shall also develop a schedule or table to assist the public in access of this information.

**Subtask 5D:** To facilitate EPA's Coastal Zone Management Review (CZMR), locate, for each state that has them, the State's enforceable coastal zone management policies, and identify the portions that are relevant to the VGP/sVGP. These policies shall be assembled in one place so that EPA can later add them to the VGP/sVGP administrative records.

EPA conducted this review for the 2008 VGP. The contractor shall start the review with EPA's administrative record for the VGP, and identify where more current or detailed information may be available.

**Subtask 5D - Deliverables:**

5D - 1.0 - Update the CZMR documentation: Within 14 days of receiving technical direction from the WAM to proceed, the Contractor shall provide a review of the Administrative Record of the VGP and identify where more detailed information is necessary. The Contractor will then support EPA in locating and assembling the information so that it can be added to the administrative record.

5D - 2.0 Bibliography of CZMR Documents: Within 21 days of receiving technical direction from the EPA WAM to proceed, the contractor shall submit a bibliography of the CZMA documents and outline for a memorandum (EPA has a bibliography for existing documents in the docket). Within 14 days of receiving comments from the EPA WAM, the contractor shall submit a draft memorandum summarizing the enforceable conditions for each state. Within 7 days of receiving technical comments from the EPA WAM, the contractor shall submit a final 5-15 page memorandum summarizing the enforceable conditions, (plus the bibliography), and deliver, via FTP site, CD, or other electronic means, copies of all documents used in the review.

**Task 6: Provide Technical Support in the "Completion of a Regulatory Flexibility Act Analysis" like-analysis for the VGP.**

The purpose of this task is to further examine the market and non-market impacts to society from the options under the sVGP and/or VGP. This work will include quantification of the total additional market impacts incurred by those entities which must comply with any standards considered as part of these General Permit requirements. The analysis should note impacts that are additional costs above the baseline. The analysis should examine both the market impacts to permittees and to those sectors that supply controls. In other words, the analysis should include multiple sectors affected, where possible, since some sectors will incur negative costs and some will incur positive costs.

Further, this work will examine the potential distributional (economic) impacts on those complying with the requirements of this General Permit options under consideration considering the financial conditions of the particular sectors incurring those costs. Options for a non-quantitative characterization of the potential non-market impacts from compliance with the General Permit requirements under consideration will also be examined. This non-quantitative analysis should not be extensive, but rather an overview of the major potential non-market impacts.

The Contractor shall quantify the incremental market impacts associated with the General Permit options under consideration according to the methodology laid out in the deliverables. The incremental market impacts shall be considered as those impacts that differ from the baseline. The baseline will be defined as what controls vessels must implement by all anticipated regulations as of the issuance date of the permit and those controls that vessels are currently implementing voluntarily. The incremental market impacts for each option under consideration shall be presented both as total annual impacts, as well as broken down by relevant category (e.g., vessel type, discharge type, etc.). The analysis will attempt to use a performance unit to define the level of pollutant reduction per unit cost: for instance kilograms of pollutant X reduced or percent likelihood that there will be a reduction in invasive species introduction.

The EPA WAM anticipates the need for the contractor to produce two to three memoranda each approximately three pages in length. These memoranda would address specific issues that may arise during the development of the market impacts analysis. The specific content and deliverable dates will be provided to the contractor by the EPA WAM through written technical direction, when the need for a memorandum arises.

The Contractor shall analyze the distributional (economic) impacts associated with the General Permit. As this General Permit is not a Federal regulation, a Regulatory Flexibility Analysis and a Small Business Regulatory Enforcement Fairness Act analysis are not required. However, the analysis should be presented in a format that can easily be converted to a regulatory flexibility screening analysis if such an analysis should be required in the future. This will include examining the nature and significance of the impacts of the General Permit options on those entities incurring costs.

The WAM anticipates the potential for the Contractor to produce up to three memoranda each approximately three pages in length. These memoranda would address specific issues that may arise during the development of the economic impact analysis. The specific content and deliverable dates will be provided to the contractor by the WAM through written technical direction, when the need for a memorandum arises.

The Contractor shall prepare a brief non-quantified characterization of the incremental non-market impacts associated with the General Permit options under consideration according to the methodology laid out in the deliverable from Task 2A and 2C. This characterization shall provide an overview of the nature and significance of potential impacts associated with the requirements under consideration for the General Permit. Preparation of this characterization shall require no more than 40 hours level of effort in

the work plan. The final product should be no more than 10 pages in length, unless specific technical direction is given by the EPA WAM to the contrary.

The EPA WAM anticipates the need for the Contractor to produce two to three memoranda each approximately three pages in length. These memoranda would address specific issues that may arise during the development of the non-market analysis. The specific content and deliverable dates will be provided to the Contractor by the EPA WAM through written technical direction, when the need for a memorandum arises.

**Task 6 - Deliverables:**

6 - 1.0 - Draft Market Analysis: Initial draft of market analysis for proposed permits within 60 days from receiving proposed permit(s).

Revised analysis results within 14 days of receipt of comments from the EPA WAM on the draft results.

6 - 2.0- Technical memorandum: Additional deliverables (2-6 memoranda) as needed at technical direction of the EPA WAM.

6 - 3.0- Revised Draft Market Analysis: Modified draft of the analysis based on final permit options as needed delivered within 21 days of written technical direction of the EPA WAM.

**Task 7: Support in the Management of Vessel Workgroup Meetings; Senior Management Briefing; and Outside Stakeholders Meetings.**

The Contractor shall support EPA with the development of briefing materials and logistics for meetings.

Subtask 7A: The Contractor shall participate in vessel workgroup meetings either via phone call or if local, at EPA Headquarters for the purpose of providing technical expertise and input, and scribing summary notes. The teleconferences/meetings may last up to 1 or 1 ½ hours.

**Subtask 7A - Deliverables:**

7A - 1.0 - Workgroup Meeting Summaries: Summaries from workgroup meetings. Electronic summaries will be sent to EPA within 5 days of workgroup meeting.

Subtask 7B: Contractor shall prepare technical materials such as 1-2 page factsheets and power point presentations on permit conditions internal as well as external stakeholder meetings or briefings for senior management. Contractor shall assume 5 internal/external stakeholder meetings within the Washington D.C. area will be required during the period of performance.

**Subtask 7B - Deliverables:**

7B - 1.0 - Briefing Materials: Briefing materials due 5 days prior to the stakeholder meeting.

Subtask 7C: Contractor shall provide logistical support for one day outreach meeting in Washington D.C. The purpose of the meeting is to provide an opportunity for public

comment on the draft permit(s). EPA anticipates the attendance by 300 public and private sector stakeholders. The contractor shall secure the meeting location, conduct on-line registration, develop the agenda, secure audio visual equipment and facilitate the meeting. For planning purposes the contractor shall assume the meeting will take place in May/June 2011, and will require two on-site staff. The contractor will not need to provide handouts; these will be prepared by EPA. Information on the agenda and other meeting requirements will be included in the Federal Register notice announcing the meeting, which EPA will also prepare.

**Subtask 7C - Deliverables:**

7C - 1.0 - Provide Logistical Support: Logistical information (i.e. hotel and equipment costing information, etc) shall be provided to EPA within 2 weeks after meeting sites have been selected. Draft agenda and registration materials shall be delivered 2 weeks before the meeting. Meeting summaries shall be delivered within 2 weeks after the meeting.

**Task 8: Supporting Vessel Program Implementation and Outreach**

The Contractor shall support EPA's development of outreach materials and efforts in support of its vessel program.

**Task 8 - Deliverables:**

8 - 1.0 - Technical Memorandum: Up to 10 technical memoranda discussing common questions or other implementation issues on topics assigned by the EPA WAM via written technical direction.

8 - 2.0 - Develop Brochures: Up to 2 brochures for use on-line. Content and style will be assigned by the EPA WAM via written technical direction.

**Task 9: Develop the Quality Assurance Project Plan**

During option year 1 of the contract (EP-C-09-020), the Contractor prepared a Quality Assurance Project Plan (QAPP) documenting how quality assurance and quality control will be applied to the collection and use of environmental data. As requested by EPA, the contractor shall update the QAPP if necessary during this option year.

The QAPP will be used to assure that any results obtained are of the type and quality needed and expected. The QAPP shall address the collection and use of wastewater sampling data, facility questionnaire data, any models to be used, and secondary data (including the acceptance criteria), and any new database management requirements. The QAPP must describe the controls to ensure high-quality data entry. The text of the QAPP also must explicitly reference tools that the contractor will use to document and review reproducibility and traceability, such as SOPs, check lists, and guidelines. The QAPP must include the tools as attachments for EPA's review and approval. In addition, the contractor shall document relevant QA activities in any major deliverable.

**Task 9 - Deliverables:**

9 - 1.0 - Draft QAPP: A revised QAPP will be submitted within 30 days of request by EPA.

9 - 2.0 - Final QAPP: A final QAPP is due within 14 days from receipt of EPA WAM's comments (which shall incorporate comments from the WPD QA officer).